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April 11, 2019

Via ECF

The Honorable Robert W. Lehrburger,
United States District Court for the
Southern District of New York,
500 Pearl Street,
New York, New York 10007-1312.

Re: *Chen-Oster, et al. v. Goldman, Sachs & Co., et ano.*
No. 10 Civ. 6950 (AT) (RWL) (S.D.N.Y.)

Dear Judge Lehrburger:

On behalf of Defendants, we write to memorialize our April 5, 2019 telephone call with your law clerk regarding the filing of Defendants' motion to compel arbitration (the "Motion") on April 12, 2019. *See* Individual Practices Rule I-E ("For procedural or administrative matters that do not request a ruling from the Court, counsel may call Chambers.").

The Motion involves over 1,000 arbitration agreements that will be exhibits to an attorney declaration and filed under seal. Because of the significant burden associated with electronic filing of each of these exhibits and the likelihood that they may overwhelm the ECF system, Defendants will instead file on ECF a slip sheet indicating that these exhibits are under seal. All other exhibits will be filed on ECF, some of which will also be under seal or redacted.

Pursuant to your Honor's Individual Practices Rule III-G-2 ("Rule G-2") directing that unredacted copies of filed documents should be provided to the Court when the motion is fully submitted and "not on a rolling basis beforehand," Defendants will submit to Chambers a flash drive or CD containing unredacted copies of all documents filed under seal or with redactions on August 9, 2019. Consistent with Rule G-2, Defendants will then meet and confer with Plaintiffs within five business days concerning the redactions and, if necessary, file on ECF within three business days thereafter a letter explaining the reasons for seeking to file documents under seal or in redacted form.

The Honorable Robert W. Lehrburger

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Respectfully,

/s/ Ann-Elizabeth Ostrager

Ann-Elizabeth Ostrager
of Sullivan & Cromwell LLP

cc: All parties of record (by ECF)